



GOLDBERG SEGALLA^{LLP}

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February 6, 2019

VIA ELECTRONIC FILING

The Honorable Judge Alison J. Nathan
U.S. District Court Southern District of New York
40 Foley Square
New York, New York 10007

**Re: De La Rosa v. Aspenly Co. LLC et al.,
Case No.: 1:18-cv-03456**

Dear Honorable Judge Nathan:

This law firm represents Defendant Aspenly Co. LLC (“Defendant”) in the above referenced matter.

The parties in this matter jointly request that the deadline for fact discovery currently set for February 7, 2019 be extended sixty (60) days through April 8, 2019. The parties are currently working to resolve this matter through the court’s alternative dispute resolution program. This is the parties’ first request for extension of time for the fact discovery deadline. The mediation is currently scheduled for March 7, 2019, and was previously scheduled for January 11, 2019.

The parties also jointly request an adjournment for the case management conference that is currently set for February 22nd until after the scheduled mediation. The parties are available on March 19th, 21st and 22nd for a case management conference. This is the first request for an adjournment for the case management conference.

Thank you for your consideration.

Kindest regards,

Reshma Khanna, Esq.

VIA ECF: All Counsel